

ESTTA Tracking number: **ESTTA470922**

Filing date: **05/04/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| | |
|---------------------------|---|
| Proceeding | 91204437 |
| Party | Defendant AS IP Holldco, LLC |
| Correspondence Address | MARIA CHICLANA AS AMERICA, INC. 1 CENTENNIAL AVE PISCATAWAY, NJ 08854-3921 chiclanam@americanstandard.com |
| Submission | Answer |
| Filer's Name | Dennis S. Prah |
| Filer's e-mail | dprahl@ladas.com, slovera@ladas.com |
| Signature | /dp/ |
| Date | 05/04/2012 |
| Attachments | Answer - 05-04-12.pdf (4 pages)(18248 bytes) |

5. Applicant admits that Opposer's Registration Nos. 3,503,213; 3,833,099; 3,099,286 and 3,392,640 speak for themselves and otherwise denies each and every remaining allegation contained in paragraph 5 of the Notice of Opposition.
6. Applicant admits that a statement alleging use of the applied for mark in U.S. commerce in connection with the goods listed in the application has not yet been filed.
7. Applicant denies the allegations contained in paragraph 7 of the Notice of Opposition.
8. Applicant denies the allegations contained in paragraph 8 of the Notice of Opposition.
9. Applicant denies the allegations contained in paragraph 9 of the Notice of Opposition.
10. Applicant denies the allegations contained in paragraph 10 of the Notice of Opposition.
11. Applicant denies the allegations contained in paragraph 11 of the Notice of Opposition.
12. Applicant denies the allegations contained in paragraph 12 of the Notice of Opposition.
13. Applicant denies the allegations contained in paragraph 13 of the Notice of Opposition.

WHEREFORE, Applicant prays that the present Notice of Opposition be dismissed in its entirety and with prejudice, that the application be issued for the goods specified therein, and that it be granted such other relief as deemed proper and just.

Respectfully submitted,

AS IP Holldco, LLP.

May 4, 2012
New York, New York

By: _____


A handwritten signature in blue ink, appearing to be 'D. Prah', is written over a light gray rectangular background.

Dennis S. Prah
Sebastian Lovera R.
Attorneys for Applicant
LADAS & PARRY LLP
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(212) 708-1800
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CERTIFICATE OF SERVICE

It is hereby certified that on May 4, 2012, a true copy of the foregoing ANSWER is being served by first-class mail, postage prepaid, to attorneys for Opposer, at the following address:

Mark J. Diliberti
Eric M. Schmalz
Foley & Lardner LLP
777 E Wisconsin Avenue
Milwaukee, WI 53202

A handwritten signature in blue ink, appearing to read "Sebastian Lovera R.", is written over a rectangular area with a light blue dotted background.

By: _____

Sebastian Lovera R.